Tel 850.444.6111

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COMMISSION CLERK



February 28, 2011

Ms. Ann Cole, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

claim of confidentiality notice of intent

X request for confidentiality filed by OPC

For DN 01344-11, which is in locked storage. You must be

authorized to view this DN.-CLK

Dear Ms. Cole:

RE: Docket No. 110001-EI

Enclosed is Gulf Power Company's Request for Confidential Classification pertaining to Schedule CCA-4 of Exhibit RWD-1 to the Direct Testimony of Richard W. Dodd dated March 1, 2011.

Sincerely,

Susan D. Ritenour Secretary and Treasurer and Regulatory Manager

vm

CC:

Enclosures

COM _____APA _____
ECR _____
GCL ____
RAD ____
SSC ____
ADM ____
OPC ____

CLK

Beggs & Lane Jeffrey A. Stone, Esq.

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DOCUMENT NUMBER - DATE

01343 MAR - 1 =

FPSC-COMMISSION CLERM

IN RE: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor

CERTIFICATE OF SERVICE

John T. Burnett/Dianne M. Triplett Progress Energy Service Co. P. O. Box 14042 St. Petersburg FL 33733-4042

john.burnett@pgnmail.com

Patrick K. Wiggins Post Office Drawer 1657 Tallahassee, FL 32302 wigglaw@gmail.com

I HEREBY CERTIFY that a true copy of the foregoing was furnished by U. S. Mail this 28st day of February, 2011, on the following: Erik L. Sayler, Sr. Attorney Office of General Counsel FL Public Service Commission 2540 Shumard Oak Boulevard Tallahassee FL 32399-0850 esavler@psc.state.fl.us

Docket No.: 110001-EI

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JEFFREY A. STONE Florida Bar No. 325953 **RUSSELL A. BADDERS** Florida Bar No. 007455 STEVEN R. GRIFFIN Florida Bar No. 0627569 **BEGGS & LANE** P. O. Box 12950 Pensacola FL 32591-2950 (850) 432-2451

Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and purchased power cost recovery clause and generating performance incentive factor

Docket No.: 110001-EI

Date: March 1, 2011

REQUEST FOR CONFIDENTIAL CLASSIFICATION

GULF POWER COMPANY ["Gulf Power", "Gulf", or the "Company"], by and through its undersigned attorneys and pursuant to Rule 25-22.006, Florida Administrative Code, hereby files its request that the Florida Public Service Commission enter an order protecting from public disclosure certain information contained in Schedule CCA-4 of Exhibit RWD-1 to the Direct Testimony of Richard W. Dodd dated March 1, 2011, (Schedule CCA-4) on behalf of Gulf Power. As grounds for this request, the Company states:

1. A portion of the information contained in Schedule CCA-4 is proprietary confidential business information regarding contractual matters which would cause irreparable harm to Gulf Power, the entities with whom it has contracted, and most importantly, to Gulf's customers if such information was disclosed to the general public. In addition, the Schedule contains information relating to competitive interests in capacity markets which would cause irreparable harm to Gulf Power and the entities with whom it has contracted if such information was disclosed to the general public. The information is entitled to confidential classification pursuant to section 366.093(3) (d) and (e), Florida Statutes. Schedule CCA-4 provides the price terms for capacity contracts entered into by Gulf Power for 2010. The price terms in these contracts are regarded by both Gulf and the counterparty as confidential. The pricing, which resulted from negotiations between Gulf and the counterparty, is specific to the individual contracts and is not publicly known. Disclosure of this information would negatively impact Gulf's ability to negotiate pricing favorable to its customers in future capacity contracts because potential counterparties may refuse to enter into contracts with Gulf, or may charge higher prices if the price terms were made public.

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- 2. The information filed pursuant to this Request is intended to be, and is treated as, confidential by Gulf Power and, to this attorney's knowledge, has not been otherwise publicly disclosed.
- 3. Submitted as Exhibit "A" is a copy of Schedule CCA-4, on which is highlighted the information for which confidential classification is requested. Exhibit "A" should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" are two (2) edited copies of Schedule CCA-4, which may be made available for public review and inspection. Attached as Exhibit "C" to this request is a line-by-line/field-by-field justification for the request for confidential classification.

WHEREFORE, Gulf Power Company respectfully requests that the Commission enter an order protecting the information highlighted on Exhibit "A" from public disclosure as proprietary confidential business information.

Respectfully submitted this 1 day of March, 2011.

JEFFREY A. STONE Florida Bar No. 325953

RUSSELL A. BADDERS

Florida Bar No. 007455

STEVEN R. GRIFFIN

Florida Bar No. 0627569

Beggs & Lane

P. O. Box 12950

Pensacola, FL 32591

(850) 432-2451

Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and purchased power cost			
recovery clause and generating performance		Docket No.:	110001-EI
incentive factor		Date:	March 1, 2011
)		

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

Provided to Commission Clerk under separate cover as confidential information.

EXHIBIT "B"

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

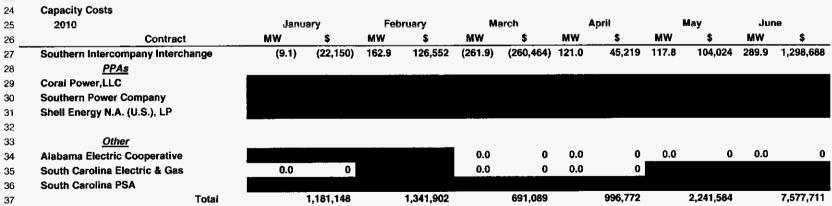
Α	В	С	D	Ε	F	G	Н	1	J	K	L	М	N	0	Р	Q
1	Gulf Pow	er Compa	ny												Sched	ule CCA-4
2	2010 Cap	acity Con	tracts												P	age 1 of 2
3																

Ten	m	Contract			
Start	End ⁽¹⁾	Туре			
2/18/2000 5	Yr Notice	SES Opco			
6/1/2009	5/31/2014	Firm			
6/1/2009	5/31/2014	Firm			
11/2/2009	5/31/2023	Non-Firm			
1/1/2010	9/30/2010	Other			
2/1/2010 1	2/14/2010	Other			
9/1/2003	-	Other			
	Start 2/18/2000 5 6/1/2009 6/1/2009 11/2/2009 12/1/2010 12/1/2010 1	2/18/2000 5 Yr Notice 6/1/2009 5/31/2014 6/1/2009 5/31/2014 11/2/2009 5/31/2023 1/1/2010 9/30/2010 2/1/2010 12/14/2010			

(1) Unless otherwise noted, contract remains effective unless terminated upon 30 days prior written notice.

(2) Contract megawatts are non-firm until June 1, 2014.

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	R	S	T	U	V	W	Х	Υ	Z	AA	AB	AC	AD	ΑE	AF	AG	AH	Al
1	(aulf Pow	er Compa	any													Sched	fule CCA-4
2	2	010 Cap	acity Con	tracts														Page 2 of 2
3																		
4																		

	10	erm	Contract		
Contract/Counterparty	Start	End ⁽¹⁾	Туре		
Southern Intercompany Interchange	2/18/2000	5 Yr Notice	SES Opco		
<u>PPAs</u>					
Coral Power,LLC	6/1/2009	5/31/2014	Firm		
Southern Power Company	6/1/2009	5/31/2014	Firm		
Shell Energy N.A. (U.S.), LP (2)	11/2/2009	5/31/2023	Non-Firm		
<u>Other</u>					
Alabama Electric Cooperative	1/1/2010	9/30/2010	Other		
South Carolina Electric & Gas	2/1/2010	12/14/2010	Other		
South Carolina PSA	9/1/2003	-	Other		

 (1) Unless otherwise noted, contract remains effective unless terminated upon 30 days prior written notice.

(2) Contract megawatts are non-firm until June 1, 2014.

23														
24	Capacity Costs													
25	2010		July	A	ugust	Sept	ember	Oc	tober	No	vember	Dec	cember	•
26	Contract	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	Tetal \$
27	Southern Intercompany Interchange	329.9	3,416,475	145.9	1,406,709	335.3	243,833	510.0	272,351	60.5	(174,791)	(128.3)	(11,829)	6,444,617
28	<u>PPAs</u>													
29	Coral Power,LLC													
30	Southern Power Company													
31	Shell Energy N.A. (U.S.), LP													
32	Tota	i PPAs	•											41,205,038
33	<u>Other</u>							_						
34	Alabama Electric Cooperative							0.0	0	0.0	0	0.0	0	(28,541)
35	South Carolina Electric & Gas									0.0	0			(5,781)
36	South Carolina PSA													(41,118)
37	Tota	<u> </u>	13.038.629		8,753,510		6,647,593		2,059,546		1,645,473		1,399,258	47,574,215

	Α	В	С	D	E	F	G	Н	1	j	j K	J K L	J K L M	J K L M N	J K L M N O	J K L M N O P
1		Gulf Pow	er Compa	ny												Schedule
2		2010 Cap	acity Cont	tracts												Page
3																
4																
5						To	erm		Contract							
6		Contract/0	ounterpart	ty		Start	End ⁽¹⁾		Туре							
7		Southern	ntercompa	ny Intercha	inge	2/18/2000	5 Yr Notice		SES Opco							
8			<u>PPAs</u>													
9		Coral Pow	er,LLC			6/1/2009	5/31/2014		Firm							
10			Power Com			6/1/2009	5/31/2014		Firm							
11		Shell Ener	gy N.A. (U.	S.), LP ⁽²⁾		11/2/2009	5/31/2023		Non-Firm							
12			<u>Other</u>													
13		Alabama E	lectric Co	operative		1/1/2010	9/30/2010		Other							
14		South Car	olina Electi	ric & Gas		2/1/2010	12/14/2010		Other							

Other

(1) Unless otherwise noted, contract remains effective unless terminated upon 30 days prior written notice.

9/1/2003

(2) Contract megawatts are non-firm until June 1, 2014.

	Costs

South Carolina PSA

í8

_	Oupdon's Ocoro												
5	2010	Jane	uary	Febr	ruary	Ma	arch		April		May	Jur	ne
6	Contract	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$
7 –	Southern Intercompany Interchar	nge (9.1)	(22,150)	162.9	126,552	(261.9)	(260,464)	121.0	45,219	117.8	104,024	289.9	1,298,688
8	<u>PPAs</u>												
9	Coral Power,LLC												
0	Southern Power Company												
1	Shell Energy N.A. (U.S.), LP												
2													
3	<u>Other</u>												
4	Alabama Electric Cooperative					0.0	0	0.0	0	0.0	0	0.0	0
5	South Carolina Electric & Gas	0.0	0			0.0	0	0.0	0				
6	South Carolina PSA												
7	1	Total	1,181,148		1,341,902		691,089		996,772		2,241,584		7,577,711

	R	S	T	U	V	W	Х	Υ	Z	AA	AB	AC	AD	ΑE	AF	AG	AH	Al
1	(Gulf Pow	er Compa	ny													Sched	ule CCA-4
2	2	2010 Cap	acity Con	tracts													F	Page 2 of 2
3																		
4																		
5						Term	n		Contract									

5		i erm	Contract
6	Contract/Counterparty	Start End (1)	Туре
7	Southern Intercompany Interchange	2/18/2000 5 Yr Notice	SES Opco
8	<u>PPAs</u>		
9	Coral Power,LLC	6/1/2009 5/31/2014	Firm
10	Southern Power Company	6/1/2009 5/31/2014	Firm
11	Shell Energy N.A. (U.S.), LP (2)	11/2/2009 5/31/2023	Non-Firm
12	<u>Other</u>		

Other Alabama Electric Cooperative Other 13 1/1/2010 9/30/2010 South Carolina Electric & Gas 2/1/2010 12/14/2010 Other 14 15

South Carolina PSA 9/1/2003 Other

(1) Unless otherwise noted, contract remains effective unless terminated upon 30 days prior written notice.

(2) Contract megawatts are non-firm until June 1, 2014.

23 24 **Capacity Costs**

16 17 íŝ

	dahaa) daasa													
25	2010	J	uly	A	ugust	Septe	ember	Oc	tober	No	vember	Dec	cember	
26	Contract	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	Total \$
27	Southern Intercompany Interchang	je 329.9	3,416,475	145.9	1,406,709	335.3	243,833	510.0	272,351	60.5	(174,791)	(128.3)	(11,829)	6,444,617
28	<u>PPAs</u>													
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30	Southern Power Company													
31	Shell Energy N.A. (U.S.), LP													
32	To	tal PPAs												41,205,038
33	<u>Other</u>													
34	Alabama Electric Cooperative							0.0	0	0.0	0	0.0	0	(28,541)
35	South Carolina Electric & Gas									0.0	0			(5,781)
36	South Carolina PSA													(41,118)
37	To	otal	13,038,629		8,753,510	•	6,647,593		2,059,546		1,645,473		1,399,258	47,574,215

EXHIBIT "C"

<u>Line-by-Line/Field-by-Field Justification</u> <u>Line(s)/Field(s)</u>

Page 1 of 2

Lines 29-31, 34 and 36; Columns F-G Lines 29-31, and 34-36; Columns H-I Lines 29-31, and 36; Columns J-M Lines 29-31, and 35-36; Columns N-Q

Page 2 of 2

Lines 29-31, 34-36; Columns W-AB

Lines 29-31, 35-36; Columns AC-AD

Lines 29-31, and 36; Columns AE-AF

Lines 29-31 and 35-36; Columns AG-AH

Lines 29-31; Column AI

Justification

This information is entitled to confidential classification pursuant to §366.093(3) (d) and (e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 1.

This information is entitled to confidential classification pursuant to §366.093(3) (d) and (e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 1.

DOCUMENT NUMBER-DATE

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State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD TALLAHASSEE, FLORIDA 32399-0850

Susan D. Ritenour One Energy Place Pensacola FL 32520

Re: Acknowledgement of Confidential Filing in Docket No. 110001-El

This will acknowledge receipt by the Florida Public Service Commission,

Office of Commission Clerk, of a CONFIDENTIAL DOCUMENT filed on March 1,

2011, in the above-referenced docket.

Document Number 01344-11 has been assigned to this filing, which will be maintained in locked storage.

If you have any questions regarding this document, please contact Kim Peña, Records Management Assistant, at (850) 413-6393.